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BAYARD

BY HAND AND BY EMAIL

January 29, 2007

The Honorable Vincent J. Poppiti Blank Rome LLP 1201 Market Street, Suite 800 Wilmington, DE 19801

> Re: LG.Philips LCD Co., Ltd. v. ViewSonic, C.A. No. 04-343 JJF

Dear Special Master Poppiti:

At the January 19, 2007 Hearing, Your Honor instructed LG.Philips LCD Co., Ltd. ("LPL") and Tatung Company and Tatung Co. of America (collectively "Tatung") to continue to negotiate over the categorization of Tatung's products into "mounting systems", and to submit a status report concerning those negotiations on January 29, 2007. Pursuant to Your Honor's instructions and in addition to the proposal LPL had sent to Tatung on January 18, LPL submitted its second proposal to Tatung on January 24 and asked for Tatung to respond by Friday, January 26 so that Your Honor could be informed as to the status of the parties' progress. (See Exhibit A.) To date, Tatung has not replied to LPL's proposals.

LPL's January 24th categorization proposal fairly asks Tatung to categorize its products according to nine broad categories that are directed to all of Tatung's products. These categories not only capture all the possible permutations of rear mounting systems, but they also take into consideration each parties' proposed claim constructions. Importantly, LPL's January 24th proposal also makes clear that this entire categorization exercise could be avoided if Tatung simply provides LPL with the categories that Tatung used in producing documents for both Tatung Co. and Tatung America. Notably, this is something Tatung already represented to Your Honor that it would do, but to date has failed to provide even a date certain by which it would do so.

Having said that, during the parties' meet and confer in December of last MS. HO: year, we did explain to LPL that, for Tatung Company, we produced drawings that showed the mounting systems used for most of our products. There were a couple that were are still looking for technical documents for. But we told them that the documents we have provided are representative of all of the mounting systems used, and we also agreed to provide a list that would tell them which documents are representative of which products and which documents would cover which product, and we have agreed to give that to LPL.

(Tr. from January 19, 2007, p. 52, ll. 21 - p. 53, ll. 8.)

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Given that at least the fact depositions in this case are scheduled to begin shortly, and given there are less than nine (9) weeks to conduct that discovery, LPL cannot afford for Tatung to delay the categorization process any longer. Accordingly, LPL respectfully requests that Your Honor set a date and time in the very near future (if possible even before the next status conference) for the parties to fully address this issue.

Respectfully submitted,

/s/ Richard D. Kirk (rk0922)

cc: Counsel as shown on the attached certificate

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on January 29, 2007, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

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The undersigned counsel further certifies that copies of the foregoing document were sent by hand to the above counsel and by email and will be sent by first class mail to the following non-registered participants:

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> /s/ Richard D. Kirk (rk922) Richard D. Kirk